

# ROCKY FLATS SITE REGULATORY CONTACT RECORD

---

**Purpose:** Disposition December 2005 - May 2006 monitoring results for manganese at the Present Landfill Treatment System (PLFTS)

---

**Contact Record Approval Date:** March 13, 2007

**Site Contact(s) / Affiliation(s):**

Scott Surovchak / DOE, Doug Hansen / S.M. Stoller, George Squibb / S.M. Stoller, John Boylan / S.M. Stoller, Linda Kaiser / S.M. Stoller

**Regulatory Contact(s) / Affiliation(s):**

Mark Aguilar / EPA, Larry Kimmel / EPA, Carl Spreng / CDPHE

---

**Discussion:**

As part of Present Landfill closure, a passive seep interception and treatment system has been installed to treat volatile organic compounds (VOCs) in landfill seep water and ground water intercept system (GWIS) water. There are three sources of influent to the treatment system: two GWIS pipes, and the Present Landfill seep. Effluent from the treatment system eventually flows to the Landfill Pond.

As required by the *Present Landfill Monitoring and Maintenance Plan and Post-Closure Plan* and detailed in the 2006 Integrated Monitoring Plan (to be superseded under the Rocky Flats Legacy Management Agreement [RFLMA] by the Rocky Flats Site Operations Guide [RFSOG]), treatment system effluent monitoring requirements consist of routine quarterly sampling for VOCs, metals, and other analytes to evaluate remedy performance. A validated exceedance of a surface-water standard at the treatment system effluent triggers monthly effluent sampling for three consecutive months. Continued exceedances during the 3-month period triggers sampling of the Landfill Pond for those constituents in question. Continued exceedances also trigger consultation between the parties to determine whether a change in the remedy is required, additional parameters need to be analyzed, or a modification of the monitoring plan is warranted. If surface water standards are exceeded in the Landfill Pond, the parties consult to determine if further monitoring modifications are warranted and if Landfill Pond operations should be addressed.

The routine quarterly effluent sample collected on 12/28/05 (Table 1) showed a manganese concentration exceeding the applicable Rocky Flats Cleanup Agreement (RFCA) standard of 1,858 ug/L. Subsequent sampling on a monthly frequency (Table 1) also showed manganese concentrations exceeding the RFCA standard, triggering sampling of the Landfill Pond (Table 2) and consultation.

Formal consultation regarding this issue took place in June 2006.

**Table 1. Present Landfill Treatment System Effluent (PLFSYSEFF): Summary of Analytical Results**

Analyte	Sample Date	Result	Units	RFCA Standard
Manganese, total	<b>12/28/05</b>	<b>6,100</b>	<b>µg/L</b>	<b>1,858</b>
	2/23/06	5,650	µg/L	1,858
	3/20/06	5,430	µg/L	1,858
	4/19/06	5,310	µg/L	1,858
	5/23/06	7,000	ug/L	1,858

Notes: The initial result triggering monthly sampling is shown in **bold**. The routine quarterly samples are shown in italics.

**Table 2. Present Landfill Pond (PLFPONDEFF): Summary of Analytical Results**

Analyte	Sample Date	Result	Units	RFCA Standard
Manganese, total	5/23/06	24	µg/L	1,858

Notes: The 4/19/06 PLFSYSEFF result (Table 1) was received on 5/23/06, triggering pond sampling.

**Resolution:**

The manganese sample collected from the Landfill Pond (Table 2) was below the RFCA standard, and no action concerning Landfill Pond operations is warranted at this time. The parties also recognize that the PLFTS is designed to treat VOCs, not metals such as manganese. Routine quarterly sampling at the PLFTS with regard to manganese will continue as currently implemented and based on this consultation. The parties will continue to be consulted regarding the quarterly manganese sampling results at the PLFTS effluent, with the intention that implementation of monthly or supplemental PLFTS effluent manganese sampling be based on those future consultations. To aid future consultations, samples for manganese only will be collected from the Landfill Pond in conjunction with the routine quarterly PLFTS effluent samples. The parties agree to evaluate Landfill Pond operations should manganese concentrations in the Landfill Pond exceed the applicable surface water standard. Contact records for future consultations regarding manganese at the PLFTS and Landfill Pond will be generated as required.

**Contact Record Prepared by:** George Squibb

---

**Distribution:**

Mark Aguilar, EPA  
Larry Kimmel, EPA  
Carl Spreng, CDPHE  
Dave Kruchek, CDPHE  
John Rampe, DOE  
Scott Surovchak, DOE

John Boylan, Stoller  
George Squibb, Stoller  
Linda Kaiser, Stoller  
Anna Montoya, Stoller